AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts Southern District of Texas FILED

Printed name and title

	Southern District of Texas				February 14, 2025	
United States of America v. Jinyi ZHENG YOB: 2006 People's Republic of China Defendant(s)) Case No: M-25-0310-M.)))	Nathan Ochsne	r, Clerk of Court	
		CRIMINAI	L COMPLAINT			
I, the cor	mplainant in this cas	se, state that the follow	wing is true to the best of my know	vledge and belief.		
On or about the o	date(s) of	February 12, 2025	in the county of	Hidalgo	in the	
Southern	District of	Texas ,	the defendant(s) violated:			
Code Section			Offense Description			
			Child Pornography			
This crin	-	ased on these facts:				
♂ Conti	nued on the attache	d sheet.				
Approved by AUSA D. Walker			Complain	Salome Mancias Inplainant's signature		
Submitted by reliable electronic means, sworn to and attested telephonically per FED.R.CR.4.1, and probable cause found on:				ias, Special Agen name and title	<u>t</u>	
Date: February 14, 2025 at 2:40 pm		pm	Judge	Judge's signature		
City and state:	McA	Allen, Texas	Nadia S. Medrano , Uni	ted States Magisti	rate Judge	

ATTACHMENT A

On February 14, 2025, Homeland Security Investigation (HSI), McAllen, Texas, received a request for assistance from United States Border Patrol (USBP) regarding the possession of child pornography in a cellphone belonging Chinese National Jinyi ZHENG.

On February 12, 2025, ZHENG was apprehended by USBP near Hidalgo, Texas, attempting to enter the United States illegally from the United Mexican States and was in possession of her Apple iPhone 14. ZHENG granted written consent, on a preprinted form, in the Chinese language, to search her Apple iPhone 14. A forensic extraction was conducted of the iPhone 14 and during the examination of the "videos" folder by HSI Special Agents (SA), approximately six (6) videos were discovered that met the federal definition of child pornography.

One of the videos discovered, approximately 2 minutes and 23 seconds in length, was of a prepubescent minor female being penetrated by an adult male. In the video, the minor female is attempting to cover her face, and she is crying.

ZHENG's cellphone, an Apple iPhone 14, manufactured in China, was used by ZHENG to facilitate the transportation of child pornography in violation of Title 18, United States Code 2252 from Mexico into the United States.